

Janis C. Puracal, OSB #132288  
E-mail: [jcp@mlrlegalteam.com](mailto:jcp@mlrlegalteam.com)  
Andrew C. Lauersdorf, OSB #980739  
E-mail: [acl@mlrlegalteam.com](mailto:acl@mlrlegalteam.com)  
MALONEY LAUERSDORF REINER, PC  
1111 E. Burnside Street, Ste. 300  
Portland, OR 97214  
Telephone: (503) 245-1518  
Facsimile: (503) 245-1417

David B. Owens, WSBA #53856, *pro hac vice*  
E-mail: [david@loevy.com](mailto:david@loevy.com)  
LOEVY & LOEVY c/o  
Civil Rights and Justice Clinic  
University of Washington Law School  
William H. Gates Hall, Suite 265  
PO Box 85110  
Seattle, WA 98145-1110  
Telephone: (312) 590-5449

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an  
individual and as guardian *ad litem*, on behalf  
of S.M., a minor,  
Plaintiffs,

Civil No. 6:20-cv-01163-MTK  
(Lead Case)

v.

PLAINTIFFS' WITNESS LIST

MARK DANNELS, PAT DOWNING,  
SUSAN HORMANN, MARY KRINGS,  
KRIS KARCHER, SHELLY MCINNES,  
RAYMOND MCNEELY, KIP OSWALD,  
MICHAEL REAVES, JOHN RIDDLE, SEAN  
SANBORN, ERIC SCHWENNINGER,  
RICHARD WALTER, CHRIS WEBLEY,  
ANTHONY WETMORE, KATHY WILCOX,  
CRAIG ZANNI, DAVID ZAVALA, JOEL D.  
SHAPIRO AS ADMINISTRATOR OF THE  
ESTATE OF DAVID E. HALL, VIDOCQ  
SOCIETY, CITY OF COQUILLE, CITY OF  
COOS BAY, and COOS COUNTY,

Defendants.

Page 1– PLAINTIFFS' WITNESS LIST

VIDOCQ SOCIETY,  
Cross-Claimant,

v.

MARK DANNELS, PAT DOWNING,  
SUSAN HORMANN, MARY KRINGS,  
KRIS KARCHER, SHELLY MCINNES,  
RAYMOND MCNEELY, KIP OSWALD,  
MICHAEL REAVES, JOHN RIDDLE, SEAN  
SANBORN, ERIC SCHWENNINGER,  
RICHARD WALTER, CHRIS WEBLEY,  
ANTHONY WETMORE, KATHY WILCOX,  
CRAIG ZANNI, DAVID ZAVALA, JOEL D.  
SHAPIRO AS ADMINISTRATOR OF THE  
ESTATE OF DAVID E. HALL, VIDOCQ  
SOCIETY, CITY OF COQUILLE, CITY OF  
COOS BAY, and COOS COUNTY

Cross-Defendants.

NICHOLAS JAMES MCGUFFIN, as an  
individual and as guardian *ad litem*, on behalf  
of S.M., a minor,

Plaintiffs,

v.

OREGON STATE POLICE,

Defendant.

Civil Case No. 3:21-cv-01719-MTK  
(Trailing Case)

Pursuant to the Court's Trial Management Order [Dkt. No. 384], Plaintiffs anticipate calling the following witnesses, listed in alphabetical order below:

	<i>Honorific / Name / Occupation (if relevant) / Pronouns</i>	<i>Time Estimate for Direct</i>	<i>Substance of Testimony</i>
1.	Mr. Nick Backman (he/him)	0.5 hour	Mr. Backman saw Leah Freeman on the night that she disappeared. He will testify about the events of June 28, 2000; specifically, the time and location at which he saw Ms. Freeman. He will also testify to statements he made to the Defendants and

	<i>Honorific / Name / Occupation (if relevant) / Pronouns</i>	<i>Time Estimate for Direct</i>	<i>Substance of Testimony</i>
			physical evidence he provided to the Defendants to confirm his sighting of Ms. Freeman.
2.	Mr. Larry Barksdale (he/him)	1.0 hour	Mr. Barksdale is an expert witness. He will testify consistent with his expert report.
3.	Ms. Georgia Bartholomew (she/her)	1.0 hour	Plaintiffs intend to move <i>in limine</i> to exclude evidence of Nicholas McGuffin's relationships post-exoneration. In the event the Court denies the motion, Ms. Bartholomew will testify about her relationship with Nicholas McGuffin.
4.	Ms. Denise Bertrand (formerly Freeman) (she/her)	2.0 hours	Ms. Bertrand is the sister of Leah Freeman. She will testify about her observations of the relationship between Nicholas McGuffin and Ms. Freeman. She will also testify about the events of June 28, 2000; specifically, the times and locations at which she saw Mr. McGuffin and Ms. Freeman. She will also testify about her observations of the car that Mr. McGuffin was driving and his demeanor on the night that Ms. Freeman disappeared. She will further testify to statements the Defendants made to her about the investigation into Mr. McGuffin.
5.	Dr. Suzanne Best (she/her)	2.0 hours	Dr. Best is an expert witness. She will testify consistent with her expert report.
6.	Ms. Janice Blue (she/her)	0.5 hour	Ms. Blue is the former Chief of the Coquille Police Department. Ms. Blue will testify about disciplinary

	<i>Honorific / Name / Occupation (if relevant) / Pronouns</i>	<i>Time Estimate for Direct</i>	<i>Substance of Testimony</i>
			actions taken against Defendant Ray McNeely.
7.	Mr. Thomas Bounds (he/him)	0.5 hour	Mr. Bounds was a relative of Leah Freeman. He saw her on the night that she disappeared. He will testify about the events of June 28, 2000; specifically, the times and locations at which he saw Ms. Freeman. He will also testify to statements he made to the Defendants and their statements in response.
8.	Ms. Margaret Buehner (formerly Downs) (she/her)	0.5 hour	Ms. Buehner was friends with Nicholas McGuffin. She will testify about her observations of the relationship between Mr. McGuffin and Ms. Freeman. She will also testify about the events of July 28, 2000; specifically, the times and location at which she saw Mr. McGuffin, and her interaction with Mr. McGuffin in the days following Ms. Freeman's disappearance. She will also testify to statements she made to the Defendants.
9.	Ms. Quinn Cannon (she/her)	0.5 hour	Ms. Cannon was friends with Nicholas McGuffin. She will testify about her observations of the relationship between Nicholas McGuffin and Ms. Freeman. She will also testify about the events of June 28, 2000; specifically, the time and location at which she saw Mr. McGuffin. She will also testify to statements she made to the Defendants.
10.	Ms. Kristy Christoferson (she/her)	0.3 hour	Ms. Christoferson was friends with Nicholas McGuffin. She will testify about the events of

	<i>Honorific / Name / Occupation (if relevant) / Pronouns</i>	<i>Time Estimate for Direct</i>	<i>Substance of Testimony</i>
			June 28, 2000; specifically the time and location at which she saw Mr. McGuffin.
11.	Mr. Ricky Crook (he/him)	0.5 hour	Mr. Crook was friends with Nicholas McGuffin. He will testify to his statements he made to the Defendants and his observations about Kristen Steinhoff's state of mind.
12.	Ms. Stacey Crutchfield-Lyons (she/her)	0.3 hour	Ms. Crutchfield-Lyons was friends with Leah Freeman. She will testify about her observations of the relationship between Nicholas McGuffin and Ms. Freeman. She will also testify to statements the Defendants made to her about the investigation into Mr. McGuffin.
13.	Dr. Brian Cutler (he/him)	2.0 hours	Dr. Cutler is an expert witness. He will testify consistent with his expert report.
14.	Mr. Mark Dannels (he/him)	1.0 hour	Mr. Dannels is a Defendant in this case.
15.	Ms. Megan Davidson (formerly Pinkley) (she/her)	0.5 hour	Ms. Davidson knew Nicholas McGuffin. She will testify about her observations of the relationship between Nicholas McGuffin and Ms. Freeman. She will also testify about her relationship with Mr. McGuffin. She will further testify to statements she made to the Defendants.
16.	Mr. Josh Emler (he/him)	0.5 hour	Mr. Emler knew Nicholas McGuffin. He will testify about the events of June 28, 2000; specifically, the time and location at which he saw Mr. McGuffin. He will also testify about his observations

	<i>Honorific / Name / Occupation (if relevant) / Pronouns</i>	<i>Time Estimate for Direct</i>	<i>Substance of Testimony</i>
			of the car that Mr. McGuffin was driving and his demeanor on the night that Ms. Freeman disappeared. He will also testify to statements he made to the Defendants.
17.	Mr. R. Paul Frasier (he/him)	2.0 hours	Pursuant to Rule 45(c)(1) and FRE 804, Mr. Frasier is unavailable as a witness. Plaintiffs will offer portions of his videotaped deposition.
18.	Ms. Haley Greenway (she/her)	0.3 hour	Ms. Greenway was friends with Nicholas McGuffin. She will testify about her observations of the relationship between Nicholas McGuffin and Ms. Freeman. She will also testify about the events of June 28, 2000; specifically, the time and location at which she saw Mr. McGuffin. She will further testify about her observations of the car that Mr. McGuffin was driving on the night that Ms. Freeman disappeared. She will also testify to statements she made to the Defendants.
19.	Dr. Michelle Guyton (she/her)	1.5 hours	Plaintiffs intend to move <i>in limine</i> to exclude the opinions and testimony of Defendants' expert witness, Kate Amber. In the event the Court denies the motion, Dr. Guyton will testify consistent with her expert report.
20.	Mr. Kent Harman (he/him)	1.0 hour	Mr. Harman is an expert witness. He will testify consistent with his expert report.
21.	Ms. Susan Hormann (she/her)	1.0 hour	Pursuant to Rule 45(c)(1) and FRE 804, Ms. Hormann is

	<i>Honorific / Name / Occupation (if relevant) / Pronouns</i>	<i>Time Estimate for Direct</i>	<i>Substance of Testimony</i>
			unavailable as a witness. Plaintiffs will offer portions of her deposition.
22.	Ms. Alicia Hyatt (formerly Hartwell) (they/them)	1.0 hour	Ms. Hyatt testified at the underlying criminal trial. She will testify to statements made to the Defendants, and their statements to her.
23.	Mr. Eric Hartwell (he/him)	0.3 hour	Mr. Hartwell is the father of Alicia Hyatt-Hartwell. He will testify to Alicia's reputation for honesty in the community.
24.	Mr. Howard Hartwell (he/him)	0.3 hour	Mr. Hartwell is the brother of Alicia Hyatt-Hartwell. He will testify to Alicia's reputation for honesty in the community.
25.	Ms. Shannon Hartwell (she/her)	0.3 hour	Ms. Hartwell is the mother of Alicia Hyatt-Hartwell. She will testify to Alicia's reputation for honesty in the community.
26.	Mr. Russ Hicks (he/him)	3.0 hours	Mr. Hicks is an expert witness. He will testify consistent with his expert report.
27.	Dr. Charles Honts (he/him)	1.0 hour	Dr. Honts is an expert witness. He will testify consistent with his expert report.
28.	Ms. Cynthia Jones (she/her)	0.3 hour	Ms. Jones saw Leah Freeman on the night that she disappeared. She testified at the criminal trial against Mr. McGuffin. She will testify about the events of June 28, 2000; specifically, the time and location at which she saw Ms. Freeman.
29.	Ms. Kris Karcher (she/her)	1.0 hour	Ms. Karcher is a Defendant in this case.
30.	Ms. Mary Krings (she/her)	0.5 hour	Pursuant to Rule 45(c)(1) and FRE 804, Ms. Krings is unavailable as a witness.

	<i>Honorific / Name / Occupation (if relevant) / Pronouns</i>	<i>Time Estimate for Direct</i>	<i>Substance of Testimony</i>
			Plaintiffs will offer portions of her deposition.
31.	Mr. Danny Lee (he/him)	0.3 hour	Mr. Lee is a former police officer with the Coquille Police Department. He will testify about the events of June 28, 2000; specifically, the time and location at which he saw Mr. McGuffin. He will also testify about his observations of the car that Mr. McGuffin was driving and his demeanor on the night that Ms. Freeman disappeared.
32.	Mr. John Lindegren (he/him)	1.0 hour	Pursuant to Rule 45(c)(1) and FRE 804, Mr. Lindegren is unavailable as a witness. Plaintiffs will offer portions of his deposition.
33.	S.M. (she/her)	1.5 hours	S.M. is a minor Plaintiff. She will testify about her experience visiting her father in prison; her feelings about growing up without her father; and the impact that his incarceration has had on their relationship.
34.	Ms. Julianna Maul (formerly Clausen) (she/her)	0.5 hour	Ms. Maul is a photographer from Coquille. She took the photographs and videos labeled Plaintiffs' Exhibits 203, 204, 215–223 and 226–238. She will authenticate these exhibits by testifying to the date and time on which she took them.
35.	Ms. Shaun McCrea (she/her)	1.0 hour	Ms. McCrea represented Nicholas McGuffin during his criminal trial. She will testify consistent with her deposition about the items of evidence that were suppressed or

	<i>Honorific / Name / Occupation (if relevant) / Pronouns</i>	<i>Time Estimate for Direct</i>	<i>Substance of Testimony</i>
			destroyed by the Defendants during the criminal case.
36.	Ms. Kathy McGuffin (she/her)	2.0 hours	Ms. McGuffin is the mother of Nicholas McGuffin and grandmother of S.M. She is deceased. Pursuant to Rule 45(c)(1) and FRE 804, Ms. McGuffin is unavailable as a witness. Plaintiffs will offer portions of her videotaped deposition.
37.	Mr. Nicholas McGuffin (he/him)	8.0 hours	Mr. McGuffin is the lead Plaintiff. He will testify about his relationship with Leah Freeman; his activities and whereabouts on the night that Ms. Freeman disappeared; his efforts to find Ms. Freeman; his experience of the investigation that followed Ms. Freeman's disappearance; his experiences in jail and prison; and his damages.
38.	Mr. Wayne McGuffin (he/him)	1.0 hour	Mr. McGuffin is the brother of Nicholas McGuffin. He will testify to his whereabouts on June 28, 2000, and activities following the disappearance of Ms. Freeman. He will also testify to the untruthfulness of Defendants' attributions to him during the investigation. He will further testify to his observations about the impact of the wrongful conviction on Nicholas McGuffin and his family.
39.	Mr. Ray McNeely (he/him)	1.0 hour	Mr. McNeely is a Defendant in this case.
40.	Ms. Cherie Mitchell (she/her)	1.5 hours	Ms. Mitchell was friends with Leah Freeman. She will testify about her observations

	<i>Honorific / Name / Occupation (if relevant) / Pronouns</i>	<i>Time Estimate for Direct</i>	<i>Substance of Testimony</i>
			of the relationship between Nicholas McGuffin and Ms. Freeman. She will also testify about the events of June 28, 2000; specifically, the times and locations at which she saw Mr. McGuffin and Ms. Freeman. She will also testify to statements the Defendants made to her about the investigation into Mr. McGuffin.
41.	Ms. Huma Nasir (she/her)	1.5 hours	Ms. Nasir is an expert witness. She will testify consistent with her expert report.
42.	Mr. Kip Oswald (he/him)	0.5 hour	Mr. Oswald is a Defendant in this case.
43.	Mr. Skip Palenik (he/him)	0.5 hour	Mr. Palenik is an expert witness retained in the underlying criminal case by the Coos County District Attorney's Office. He will testify consistent with his report to the District Attorney.
44.	Ms. Ashley Patton (formerly Hutchinson) (she/her)	0.5 hour	Ms. Patton knew Leah Freeman. She will testify about the events of June 28, 2000; specifically, the time and location at which she saw Ms. Freeman.
45.	Dr. Julie Poehlmann (she/her)	1.0 hour	Dr. Poehlmann is an expert witness. She will testify consistent with her expert report.
46.	Ms. Nicole Price (she/her)	1.5 hours	Ms. Price knew Nicholas McGuffin. She will testify about the events of June 28, 2000; specifically, the times and locations at which she saw Mr. McGuffin. She will also testify about her observations of the car that

	<i>Honorific / Name / Occupation (if relevant) / Pronouns</i>	<i>Time Estimate for Direct</i>	<i>Substance of Testimony</i>
			Mr. McGuffin was driving, his demeanor on the night that Ms. Freeman disappeared, and the whereabouts of her boyfriend Brent Bartley that evening. She will also testify to statements she made to the Defendants and statements the Defendants made to her about the investigation into Mr. McGuffin.
47.	Mr. Michael Reaves (he/him)	1.0 hour	Mr. Reaves is a Defendant in this case.
48.	Mr. John Riddle (he/him)	0.7 hours	Pursuant to Rule 45(c)(1) and FRE 804, Mr. Riddle is unavailable as a witness. Plaintiffs will offer portions of his deposition.
49.	Mr. Jacob Shafer (he/him)	0.5 hour	Plaintiffs intend to move <i>in limine</i> to exclude evidence of Nicholas McGuffin's employment and relationships post-exoneration. In the event the Court denies the motion, Mr. Shafer will testify about Mr. McGuffin's employment at Legends Bar & Grill.
50.	Ms. Melissa Smith (she/her)	0.5 hour	Ms. Smith was friends with Leah Freeman and Nicholas McGuffin. She will testify about her observations of the relationship between Ms. Freeman and Mr. McGuffin. She will also testify about the events of June 28, 2000; specifically, the times and locations at which she spoke with Ms. Freeman. She will also testify to statements the Defendants made to her about the investigation into Mr. McGuffin.
51.	Mr. Pat Smith (he/him)	1.0 hour	Mr. Smith is a former officer

	<i>Honorific / Name / Occupation (if relevant) / Pronouns</i>	<i>Time Estimate for Direct</i>	<i>Substance of Testimony</i>
			with the Coquille Police Department. He will testify to the investigation at CPD and statements made by the Defendants.
52.	Ms. Kyla Stevens (she/her)	0.5 hour	Pursuant to Rule 45(c)(1) and FRE 804, Ms. Stevens is unavailable as a witness. Plaintiffs will offer portions of her deposition.
53.	Ms. Lyndee Stidham (formerly Kindred) (she/her)	0.5 hour	Ms. Kindred was friends with Nicholas McGuffin. She will testify about the events of June 28, 2000; specifically, the time and location at which she saw Mr. McGuffin. She will also testify about her observations of the car that Mr. McGuffin was driving and his demeanor on the night that Ms. Freeman disappeared. She will further testify about seeing Mr. McGuffin and Ms. Bertrand looking for Ms. Freeman a couple days later. She will also testify to statements she made to the Defendants.
54.	Ms. Amanda Szarkowski (formerly Landmark) (she/her)	0.3 hour	Ms. Landmark was friends with Nicholas McGuffin. She will testify about her observations of the relationship between Nicholas McGuffin and Ms. Freeman. She will also testify about the events of June 28, 2000; specifically, the time and location at which she saw Mr. McGuffin. She will further testify to statements she made to the Defendants.
55.	Ms. Maegan Traglio (formerly Edgerton) (she/her)	1.0 hour	Pursuant to Rule 45(c)(1) and FRE 804, Ms. Traglio is unavailable as a witness.

	<i>Honorific / Name / Occupation (if relevant) / Pronouns</i>	<i>Time Estimate for Direct</i>	<i>Substance of Testimony</i>
			Plaintiffs will offer portions of her videotaped deposition.
56.	Mr. Robert Wallace (he/him)	0.5 hour	Plaintiffs intend to move <i>in limine</i> to exclude evidence of Nicholas McGuffin's employment and relationships post-exoneration. In the event the Court denies the motion, Mr. Wallace will testify about events related to Mr. McGuffin's employment at Legends Bar & Grill.
57.	Mr. Chris Webley (he/him)	1.0 hour	Mr. Webley is a Defendant in this case.
58.	Ms. Kathy Wilcox (she/her)	1.0 hour	Pursuant to Rule 45(c)(1) and FRE 804, Ms. Wilcox is unavailable as a witness. Plaintiffs will offer portions of her deposition.
59.	Mr. Craig Zanni (he/him)	1.5 hours	Mr. Zanni is a Defendant in this case.
60.	Mr. David Zavala (he/him)	0.5 hour	Mr. Zavala is a Defendant in this case.

Plaintiffs reserve the right to call additional witnesses and/or rebuttal witnesses at trial.

Plaintiffs also reserve the right to call any witnesses listed on the Defendants' witness list.

Plaintiffs specifically reserve the right to make objections to witnesses' testimony at trial.

DATED: July 7, 2025

MALONEY LAUERSDORF REINER PC   By <u>/s/Janis C. Puracal</u> Janis C. Puracal, OSB #132288 E-Mail: <a href="mailto:jcp@mlrlegalteam.com">jcp@mlrlegalteam.com</a> Andrew C. Lauersdorf, OSB #980739 E-Mail: <a href="mailto:acl@mlrlegalteam.com">acl@mlrlegalteam.com</a>	LOEVY & LOEVY   By <u>/s/David B. Owens</u> David B. Owens, WSBA #53856 E-Mail: <a href="mailto:david@loevy.com">david@loevy.com</a> <i>Pro hac vice</i>
---	--

## CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2025, the foregoing PLAINTIFFS' WITNESS LIST was served on the following parties at the following address by sending to them a true copy thereof via the method indicated below:

Robert E. Franz, Jr. Sarah R. Henderson Law Office of Robert E. Franz, Jr. PO Box 62 Springfield, OR 97477 rfranz@franzlaw.comcastbiz.net shenderson@franzlaw.comcastbiz.net <i>Attorneys for Defendants</i> <i>City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore, Shelly McInnes</i>	Jesse B. Davis Todd Marshall Kristen Hoffmeyer Oregon Department of Justice 100 SW Market Street Portland, OR 97201 todd_marshall@doj.state.or.us jesse_b.davis@doj.state.or.us kristen.hoffmeyer@doj.state.or.us <i>Attorneys for Defendants Oregon State Police, John Riddle, Susan Hormann, Mary Krings, Kathy Wilcox</i>
Anthony R. Scisciani III Kelsey L. Shewbert Meredith A. Sawyer Lisa Lear HWS Law Group 101 SW Main Street, Suite 1605 Portland, OR 97204 ascisciani@hwslawgroup.com kshewbert@hwslawgroup.com msawyer@hwslawgroup.com llear@hwslawgroup.com <i>Attorneys for Defendant Vidocq Society</i>	Eric S. DeFreest Luvaas Cobb 777 High Street, Ste. 300 Eugene, OR 97401 edefreest@luvaascobb.com  Laura E. Coffin Coffin Law 541 Willamette Street, Ste. 211 Eugene, OR 97401 lauracoffin@coffin.law <i>Attorneys for Defendant Richard Walter</i>

by electronic means through the Court's ECF System on the date set forth above.

MALONEY LAUERSDORF REINER PC

By /s/Janis C. Puracal  
 Janis C. Puracal, OSB #132288  
 E-Mail: [jcp@mlrlegalteam.com](mailto:jcp@mlrlegalteam.com)

Attorneys for Plaintiffs